UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED STATES OF AMERICA)
) NO. 3:25-cr-00115
)
v.) MAGISTRATE JUDGE HOLMES
)
)
KILMAR ABREGO GARCIA)

MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL

Through counsel, Kilmar Abrego Garcia moves this Honorable Court to allow him to file a motion under seal.

The "Administrative Practices and Procedures for Electronic Case Filing (ECF)" requires parties to file a motion seeking leave of court prior to filing any documents electronically under seal. In this case, the document contains confidential and sensitive information, and defense counsel therefore requests that the document be placed under seal.

Respectfully submitted,

s/ Will Allensworth

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Attorney for Kilmar Abrego Garcia

CERTIFICATE OF SERVICE

I hereby certify that on June 13, 2025, I electronically filed the foregoing *Motion for Leave to File Document Under Seal* with the U.S. District Court Clerk by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: Robert E. McGuire, Assistant U.S. Attorney, 719 Church St., Suite 3300, Nashville, TN, 37203.

s/ Will Allensworth
WILL ALLENSWORTH